

September 8, 1998

John Seitz
Director
Office of Air Quality Planning
and Standards
U.S. Environmental Protection Agency
MD-10
Research Triangle Park, NC 27711

Dear Mr. Seitz:

We are writing on behalf of STAPPA and ALAPCO to apprise you of progress made in the ongoing effort to integrate training into the regulatory development process. The STAPPA/ALAPCO/EPA Joint Training Committee (JTC) has successfully run two training integration pilot projects -- one for the particulate matter monitoring rule and the other for the Oil and Natural Gas MACT. These demonstration projects have established a model for incorporating training development into future EPA rules. As you requested in your letter from January 1998, since it is not possible to devote this level of attention to every upcoming regulation, the JTC has developed a set of criteria (enclosed with this letter) for targeting limited training resources towards those upcoming regulations for which "training integration" is absolutely essential.

In order to leave ample time for assembling the integration processes and resources, the JTC recommends applying the criteria to those regulations\actions that will be proposed or "started" in 1999 and 2000. To this end, we think it is appropriate for EPA to assign staff to this project, who will receive guidance from STAPPA/ALAPCO during the monthly JTC conference calls and during the semi-annual training meetings. Indeed, during the next JTC meeting, *Air Pollution Training: 1999 and Beyond*, to take place on November 4, 1998 in St. Louis, MO, we would like to conduct a working session throughout the morning to assist EPA in selecting regulations for training integration. We request that either you or one of your division chiefs participate in this session in order for it to be a productive one for both EPA and STAPPA/ALAPCO.

STAPPA and ALAPCO would like to receive a response by September 25, 1998 that communicates EPA's intent with respect to the issues raised and describes the mechanism through which the agency expects to further explore suggestions and to place viable approaches in place. If you have any questions, feel free to call Mary Boyer at 916/322-6037 and Daniel Shea at 205/535-4206.

Sincerely,

Mary Boyer (CA)
STAPPA Training
Committee Chair

Daniel Shea
(Huntsville, AL)
ALAPCO Training
Committee Chair

Enclosures